

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Firs Home Owners Association,

Plaintiff,

v.

City of SeaTac, a Municipal Corporation,

Defendant.

NO. 2:19-cv-01130-RSL

DECLARATION OF JEFF ROBINSON

Pursuant to 28 U.S.C. § 1746, I, Jeff Robinson, state and declare under penalty of perjury as follows:

1. I am the Director of the City of Tacoma Department of Community and Economic Development. Prior to taking my current position, I was the Acting Director of the City of SeaTac's Department of Community and Economic Development ("CED") from April 2015 to March 2017, and the Director of CED from March 2017 to July 2018. This declaration is based on my own personal knowledge.

2. In May 2016, the City of SeaTac received a mobile home park relocation plan from Fife Motel, Inc. ("Fife Motel"). Fife Motel sought administrative review and approval of the relocation plan pursuant to SeaTac Municipal Code ("SMC") §

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2 15.465.600(H). In the relocation plan, Fife Motel indicated that it planned to close the Firs  
3 Mobile Home Park at 20440 International Boulevard and redevelop the property. To my  
4 recollection, this was the only mobile home park relocation plan processed by CED during  
5 the ten years I was employed by the City of SeaTac.

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7 3. Issues surrounding the closure and relocation of mobile home parks in  
8 Washington are governed primarily by state law. However, SeaTac has adopted its own  
9 ordinance at SMC § 15.465.600(H). Under this ordinance, the review and approval of  
10 mobile home park relocation plans is handled as an administrative matter by CED. Then-  
11 Planning Manager Steve Pilcher was the CED employee with primary responsibility for  
12 processing the mobile home park relocation plan submitted by Fife Motel, although, as CED  
13 Director, the final decision on the application was mine.

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15 4. Prior to July 2016, I had not visited and was generally unfamiliar the Firs  
16 Mobile Home Park. On July 11, 2016, Mr. Pilcher and I attended an open house/community  
17 meeting organized by Fife Motel and attended by many residents of the Firs Mobile Home  
18 Park. I had reviewed the City's ordinance and believed that this meeting satisfied the  
19 requirement at SMC § 15.465.600(H)(2)(b) that the City of SeaTac schedule a meeting with  
20 the residents to discuss the proposed relocation plan. At the July 11, 2016, open  
21 house/community meeting, I observed that many residents of the Firs Mobile Home Park  
22 were either Hispanic or Latino and that some appeared to have limited English proficiency.

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24 5. Mr. Pilcher and I subsequently met on several occasions to discuss the  
25 relocation plan submitted by Fife Motel. It was apparent that the relocation did not meet the  
26 requirements of the City's ordinance. Mr. Pilcher and I also discussed, and then decided,

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2 that the City should require Fife Motel to translate the main portions of the relocation plan  
3 into Spanish. This was not required by the City's ordinance, but was instead an effort by  
4 CED to ensure the relocation plan could be understood by residents of the Firs Mobile Home  
5 Park with limited English proficiency.

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7 6. CED informed Fife Motel that parts of the relocation plan needed to be  
8 amended or supplemented. CED also asked Fife Motel to prepare a portion of the relocation  
9 plan in Spanish. When it did so, the City paid to have the translated portion reviewed by a  
10 third-party consultant, who opted to produce her own translation of the relocation plan. This  
11 version was included with the final relocation plan approved by CED in October, 2016.

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13 7. I have reviewed a copy of the first amended complaint filed by the plaintiff in  
14 this lawsuit. I take offense to allegations that CED's process or decision was motivated by  
15 discrimination. CED's employees, including Mr. Pilcher and myself, are professionals. The  
16 suggestion that land use decisions of CED's were influenced by perceived preferences of  
17 City Council members is erroneous. I had no idea whether any SeaTac City Council  
18 members had opinions one way or the other about the relocation plan. The plaintiff's  
19 allegations reflect a fundamental misunderstanding of the review process outlined by the  
20 City's ordinance, which did not involve the City Council. CED issued a certificate  
21 approving the relocation plan submitted by Fife Motel because it determined the relocation  
22 plan satisfied the requirements of SMC § 15.465.600(H)(1) and for no other reason.

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24 8. I am aware that in an appeal of the City's decision to approve the relocation  
25 plan, a superior court judge later disagreed with some decisions made by CED, including  
26 that the inventory forms submitted by Fife Motel were adequate and that the City was not  
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2 required to convene a separate open house/community meeting. However, none of these  
3 errors had anything to do with either the applicant Fife Motel or the mobile home park  
4 residents. They were honest mistakes and nothing more.

5       9. As noted above, the mobile home park relocation plan was administratively  
6 reviewed by CED. Neither the City Council nor the mayor had any role in CED's review of  
7 the mobile home park relocation plan submitted by Fife Motel. I do not know whether City  
8 Council members were even aware that Fife Motel wanted to close the Firs Mobile Home  
9 Park until residents of the mobile home park began to show up at City Council meetings in  
10 October 2016. I do recall discussing the relocation plan with Acting City Manager Joseph  
11 Scorcio, who emphasized that CED should process the relocation plan in the manner  
12 required by the City's ordinance.  
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14       10. It was my personal observation that several City Council members were  
15 saddened that Fife Motel wanted to close the Firs Mobile Home Park and wanted the City to  
16 do whatever was possible to help the residents. In my position as CED director, I was  
17 instructed to help develop legislation to provide greater assistance to tenants of mobile home  
18 parks in the process of closure, including residents of the Firs Mobile Home Park in the  
19 event Fife Motel ultimately closed the park. Along with other City employees and the City's  
20 contract lobbyist, I assisted in the drafting of legislation for consideration by the Washington  
21 State Legislature that would increase the amount of relocation assistance available to  
22 residents of mobile home parks being closed. Several City Council members were very  
23 active in this process and lobbied in favor of the legislation in Olympia.  
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26       11. While I was employed with SeaTac, CED processed land use applications  
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(including associated State Environmental Policy Act (SEPA) reviews) in English. SeaTac's practice in this regard is consistent with the practice of every local government I have worked at in my 18 years as a public sector community development professional. I am unaware of any municipalities that process land use applications or perform SEPA review in languages other than English.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing declaration is true and correct.

DATED THIS 20<sup>th</sup> day of February, 2021, at Tacoma, Washington.



JEFF ROBINSON

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2021, I filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

V. Omar Barraza	<a href="mailto:omar@barrazalaw.com">omar@barrazalaw.com</a>
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

s/ QUINN N. PLANT  
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